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9 *Attorneys for Plaintiff*
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11 **UNITED STATES DISTRICT COURT**
 12 **DISTRICT OF NEVADA**

13 Tyler Baker, Individually and on behalf
 14 of all others similarly situated,

Case No. 2:20-cv-01172-JCM-DJA

15 Plaintiff,
 16 v.
 17

STIPULATION OF DISMISSAL OF
ACTION WITHOUT PREJUDICE AS TO
THE NAMED PLAINTIFF AND
WITHOUT PREJUDICE AS TO THE
PUTATIVE CLASS

18 Ignite International, LTD.,

19 Defendant.
 20

21 Plaintiff Tyler Baker and Defendant Ignite International, LTD. (“the Parties”)
 22 hereby moves to dismiss the above entitled action without prejudice as to the named
 23 Plaintiff and without prejudice as to the Putative Class, pursuant to Fed. R. Civ.
 24 Procedure 41(a)(1)(ii), each party shall bear his/its own costs. The notice and
 25 approval requirements of Federal Rule of Civil Procedure 23(e) are inapplicable to
 26 the parties’ settlement and dismissal of this Putative Class action because this action
 27 has not been certified as a class.

28 //
 29 //
 30 //



1 WHEREFORE, the Parties respectfully requests that this court dismiss this
2 action without prejudice as to the named Plaintiff, and without prejudice as to the
3 Putative Class.

4
5 **KAZEROUNI LAW GROUP, APC**

6 Date: September 1, 2020 By: *s/ Gustavo Ponce*
7 Gustavo Ponce, Esq.
8 6069 S. Fort Apache Rd., Ste. 100
9 Las Vegas, NV 89148
Attorneys for Plaintiff

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11 **FLANGAS LAW GROUP**

12 Date: September 1, 2020 By: *s/ Kimberly P. Stein*
13 Kimberly P. Stein, Esq.
14 3275 S. Jones Blvd., Ste. 105
15 Las Vegas, NV 89146
Attorneys for Defendant

16
17 IT IS SO ORDERED.
18

19 
20 UNITED STATES DISTRICT JUDGE

21 Dated: September 4, 2020
22

CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on September 1, 2020, the foregoing Stipulation was served via CM/ECF to all parties appearing in this case.

Kazerouni Law Group, APC

By: /s/ Gustavo Ponce
Gustavo Ponce, Esq.
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